I	PATRICK McKNIGHT, ESQ.		
2	Nevada State Bar 4120 7473 W Lake Mead, Suite 100		
3	Las Vegas, NV 89128		
	Telephone: (702) 822-6800		
4	JAMES S. KENT, ESQ.		
5	Nevada State Bar No. 5034		
6	9480 S. Eastern Ave. Suite 228 Las Vegas, NV 89123		
7	Telephone: (702) 385-1100		
8	Attorneys for Red Pine Trust and James Nelson		
9			
10	UNITED STATES DISTRICT COURT		
11	DISTRICT OF NEVADA		
12	FREEDOM MORTGAGE CORPORATION )		
13	Plaintiff, ) CASE NO.: 2:19-cv-01411-APG-DJA		
14	) -vs-		
15	j j		
16	JAMES S. KENT, as Trustee of the 6221 Red Pine ) Trust, et al		
17	Defendants.		
18	STIPULATION TO EXTEND DEFENDANTS' TIME TO REPLY TO PLAINTIFF'S RESPONSES (ECF 21 AND ECF 21) TO DEFENDANTS' MOTIONS TO DISMISS (ECF 10 AND ECF 11) BY NOT MORE THAN 30 DAYS		
19			
20	MORE HAN 30 DATS		
21	(FIRST REQUEST)		
22	COME NOW, Defendants JAMES S. KENT, as Trustee of the 6221 RED PINE TRUST, and		
23	JAMES B.C. NELSON, by and through their attorneys, Patrick K. McKnight, Esq., and James S. Kent,		
24	Esq., and Plaintiff FREEDOM MORTGAGE CORPORATION, by and through its attorneys Douglas		
25			
26	D. Gerrard, Esq., and Nathan R. Henderson, Esq., and stipulate:		

1	
2	
3	
4	
5	
6	
7	
8	I
9	
10	ı
11	
12	
13	
14	
15	
16	
17	l
18	
19	
20	
21	
22	
23	
24	
25	
	Ш

and

WHEREAS both counsel for these Defendants are out of state for several days preceding the current Reply due date of October 28, 2019 (as there is a Nevada state holiday during this time period); and

WHEREAS one of Defendants' counsel also has a medical procedure planned during this time;

WHEREAS Defendants will be unable to meet the current deadline of October 28, 2019; and WHEREAS both Defendants' and Plaintiff's counsel have discussed this request and agree that a one-week extension will not prejudice any party, and that this is the aforementioned Defendants' first request for an extension of time to file these Replies,

THEREFORE, the parties agree that Defendants' Replies to Plaintiff's Responses (ECF 21 and 22) to Defendants' Motions to Dismiss (ECF 10 and 11) will be filed and served no later than Monday. November 4, 2019.

IT IS SO STIPULATED.

DATED this 24th day of October, 2019.

JAMES S. KENT, LTD

James S. Kent, Esq. Nevada Bar No.: 5034

9480 S. Eastern Ave., Suite 228

Las Vegas, Nevada 89123

(702) 385-1100

jamie@jamiekent.org

Attorney for Defendants Red Pine Trust

and James Nelson

26

DATED this 2 day of October, 2019.

#13145

GERRARD COX LARSEN

Douglas D. Gerrard, Esq. Nevada Bar No. 4613

2450 St. Rose Parkway, Suite 200

Henderson, Nevada 89074 Phone: (702) 796-4000 dgerrard@gerrard-cox.com

Attorney for Plaintiff

## ĺ

## **ORDER**

Having reviewed the stipulation of the parties, and good cause appearing therefor,

IT IS HEREBY ORDERED Defendants Red Pine Trust's and James Nelson's Replies to

Plaintiff's Responses (ECF 21 and 22) to Defendants' Motions to Dismiss (ECF 10 and 11) will be filed Monday, November 4, 2019.

and served no later than Monday, November 2, 2019

Dated this 28th day of October , 2019

UNITED STATES DISTRICT COURT JUDGE